

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK
CASE NO.: 18-mc-00545

JOHN PESCATORE,

Plaintiff,

vs.

JUVENAL OVIDIO RICARDO
PALMERA PINEDA a/k/a CRISTO
REY MARISCAL PERALTA a/k/a
SIMON TRINIDAD, FUERZAS ARMADAS
REVOLUCIONARIAS DE COLOMBIA,
a/k/a FARC a/k/a REVOLUTIONARY
ARMED FORCES OF COLUMBIA
et al.,

Defendants.

NOTICE OF MOTION TO UNSEAL BY THIRD-PARTY DEFENDANTS

PLEASE TAKE NOTICE that pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, Section III(F) of this Honorable Court's Individual Practices in Civil Cases, and the United States Constitution, Third-Party Defendants Ministerio del Poder Popular de Economía, Finanzas y Comercio Exterior (Venezuela's "Ministry of Finance"); Banco de Venezuela S.A., Banco Universal ("Banco de Venezuela"); Banco Bandes Uruguay, S.A. ("Bandes Uruguay"); Bicentenario del Pueblo, de la Clase Obrera, Mujer y Comunas, Banco Universal, C.A. ("Banco Bicentenario"); Petrocedeno, S.A. ("Petrocedeno"), which is an affiliate of Petróleos de Venezuela, S.A. ("PDVSA"); and Aceites y Solventes Venezolanos Vassa, S.A., Venfleet Asphalt, Ltd., Petro San Felix, S.A., Venezuelan Heavy Industries, C.A., and Petrowarao, S.A., by and through undersigned counsel, hereby move this Court for an order unsealing the following documents:

- (1) Plaintiffs' Motion for Writ of Execution (Doc. No. 37);

- (2) Order Granting Motion for Writ of Execution (Doc. No. 40);
- (3) Plaintiffs' Motion for Writ of Execution (Doc. No. 46);
- (4) Order Granting Motion for Writ of Execution (Doc. No. 58);
- (5) Motion for Writ of Execution Against Garnishee (Doc. 85)
- (6) Order Granting Motion for Writ of Execution (Doc. No. 91).

Filed in support of this motion is the accompanying memorandum of law.

Dated: December 8, 2021

Respectfully submitted,

s/Marcos Daniel Jiménez

Marcos Daniel Jiménez

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Universal C.A; Petrocedeño, S.A.; Aceites
y Solventes Venezolanos Vassa, S.A.;
Venfleet Asphalt, Ltd.; Petro San Felix,
S.A.; Venezuelan Heavy Industries, C.A.;
and Petrowarao, S.A.*